

ORIGINAL
UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

ROLANDO HERNANDEZ,

Plaintiff,

v.

CITY OF VANCOUVER and MARK
TANNINEN,

Defendants.

NO. C04-5539-BHS

SPECIAL VERDICT FORM

We, the jury, give the following answers to the questions submitted by the Court:

A. Federal Law Claims

1. Did the City of Vancouver subject Rolando Hernandez to a racial or national origin-based hostile work environment in violation of federal law?

Yes X No

Proceed to Question No. 2.

2. Did Mark Tanninen engage in an illegal conspiracy with then Deputy Fire Chief Steven Streissguth to deprive him of equal protection of the law?

Yes No X

Proceed to Question No. 3.

B. State Law Claims Against

3. Did the City of Vancouver subject Rolando Hernandez to racial or national origin-based harassment in violation of state law?

Yes X No

Proceed to Question No. 4.

4. Did the City of Vancouver retaliate against Rolando Hernandez, in violation of state law?

Yes X No _____

If you answered "No" to all of the questions above, stop. Do not answer any more questions. Sign this verdict form and notify the bailiff. If you answered "Yes" only in response to Question # 2, skip to Question # 6. If you answered "Yes" to Question #s 1, 3, or 4, proceed to Question # 5.

C. Damages

5. What is the total amount of Rolando Hernandez's damages caused by the City of Vancouver's unlawful conduct?

Lost past wages and benefits, if any: \$ \$180,000

Lost future wages and benefits, if any: \$ \$104,000

Emotional distress damages: \$ \$1,000,000

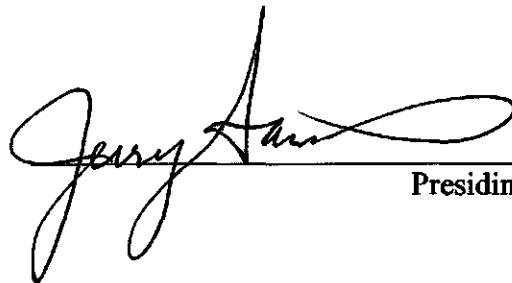
If you answered "Yes" to Question # 2, proceed to Question # 6. If you answered "No" to Question # 2, stop. Do not answer any more questions. Sign this verdict form and notify the bailiff.

6. What is the total amount of Rolando Hernandez's damages, assessed against Mr. Tanninen individually, caused by Mark Tanninen's unlawful conduct?

Damages: \$ _____

Sign this verdict form and notify the bailiff.

Date: 4/29/2014



Presiding Juror